



Northwest Richland, Inc

2019-LTR-1017

May 30, 2019

Ms. Stephanie Schleif  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA 99354

Dear Ms. Schleif

Re: Perma-Fix Northwest Richland, Inc. (PFNW)  
Mixed Waste Facility  
Site Identification Number WAR 000010355  
Contingency Plan 15-Day Incident Report

On Friday, May 17<sup>th</sup>, Perma-Fix Northwest operations personnel extinguished a small fire involving packaging material for non-hazardous radioactive waste that occurred at its Richland facility. The Emergency Coordinator evaluated the criteria in Section G.3 of the Contingency Plan located in Attachment GG of the Resource Conservation and Recovery Act (RCRA)/Toxic Substances Control Act (TSCA) Permit, and concluded that the event did not prompt implementation of the Contingency Plan. The fire did not require a time urgent response from the Fire Department, nor did it pose a threat human health or the environment. Although the Contingency Plan was not implemented, nor did the fire involve any hazardous waste, PFNW notified the Washington State Department of Ecology (WDOE) of the incident that same morning. In accordance with radiological license requirements, the Washington State Department of Health (WDOH) was also notified and arrived at the facility the morning of Friday, May 17<sup>th</sup>, to evaluate and inspect the area in which the event occurred. WDOE arrived at the PFNW facility on Monday, May 20<sup>th</sup> for an inspection of the event, and verbally disagreed with the decision to not implement the Contingency Plan. WDOE stated that they would further evaluate their determination.

*PFNW stands by its decision that the Contingency Plan did not require implementation, however to ensure compliance, PFNW is submitting this 15 Day Incident Report within 15 days of the event, as required by Section G.5.1 of the Contingency Plan.*

At approximately 3:30am PST Friday, May 17<sup>th</sup>, Perma-Fix Northwest operations personnel, Robert Clark, discovered a small fire in the Mixed Waste Thermal Building at the Mixed Waste Facility. Robert notified the security officer on-duty, who then contacted the Richland Fire Department. PFNW employee Dylan Noggles assessed the situation and was able to extinguish the fire using a fire extinguisher. The fire was

extinguished upon arrival of the fire department. Curt Cannon, Radiation Safety Officer/ESH&Q Manager, then arrived at the facility. Evaluating the information available, and the criteria as required by the PFNW Contingency Plan, Section G.3, Curt Cannon (acting as the Emergency Coordinator) made the determination that the Contingency Plan did not require implementation. The Richland Fire Department evaluated the facility to ensure it was in a safe configuration before their departure.

The event was associated with a monolith that had been staged for evaluation prior to disposal. The monolith was generated using the GeoMelt® technology developed by Veolia Nuclear Solutions. The treatment process is being performed under the treatability study requirements of WAC 173-303-071(s), however, to date the GeoMelt® process has not been used to treat any hazardous wastes.

PFNW is confident that there was not a release of radioactive or hazardous material as a result of this event, and officials from the Washington State Department of Health have initially agreed with this assertion. The fire did not involve the treatment process itself or waste material to be processed. The monolith consisted of compacted RCRA empty drums encased in glass and the material consumed in the fire was clean packaging, trash and cribbing material. Contamination readings on the outside of the monolith following the event indicated there was no spread of contaminated material ( $<1000$  dpm/100cm<sup>2</sup> Beta-Gamma and  $<20$  dpm/100 cm<sup>2</sup> Alpha), and dose rate readings on the outside of the monolith were determined to be  $<0.5$  mr/hr. Contamination surveys were also performed of the room in which the fire occurred and surrounding area, and no spread of radiological material was identified. Additionally, air samples collected during the event and during clean up did not show any elevated radiological readings.

Minor heat/smoke damage was observed on the firewall nearest the monolith, including heat damage to a fire annunciator/strobe, and the floor coating directly beneath the monolith. The fire annunciator/strobe was replaced, and the fire extinguisher used in the fire was recharged and returned to service. The remaining debris and residue that was not consumed as a result of the incident was collected and sampled for characterization. The debris and residue was containerized and is being managed in a permitted storage area until the sample analysis is available. The floor area affected by the fire was surveyed and determined to be clear of radiological material prior to cleaning, and repair activities performed.

PFNW joined with Veolia Nuclear Solutions Federal Services (VNSFS) to conduct a full review of what factors led to the fire and to ensure appropriate measures are in place to prevent a similar situation in the future. The investigation revealed that the probable cause of the fire was the packaging of the monolith prior to sufficient cooling. A temperature of 100° C or less is required prior to packaging, and it has been determined that less than adequate information or direction was provided in the operating procedure to ensure safety conditions had been achieved prior to performing the next step of the process.

Appropriate corrective actions are still being identified, and melting operations are on hold until all corrective actions have been identified and implemented.

If you have any questions regarding the information in this incident report, please feel free to contact me at (509) 375-7026.

Sincerely,



Richard Grondin  
Perma-Fix Northwest Richland, Inc.  
Vice-President and General Manager

cc electronic:

Dave Bartus, EPA  
Kathy Conaway, WDOE  
Jared Mathey, WDOE  
Kristen Schwab, WDOH

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Certification Statement

The following certification statement fulfills the requirements of Hazardous Waste Management Act, in accordance with WAC 173-303-810(13)(a), and Toxic Substance Control Act, in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc. permit for the Storage and Treatment of Mixed Waste and for the Storage and Disposal of Mixed-Toxic Substance Control Act (TSCA) Regulated Polychlorinated Biphenyl (PCB) Wastes.

The certification below covers the documentation and submission of the Contingency Plan 15-Day Incident Report submitted in letter No. 2019-LTR-1017, dated May 30, 2019.

As the Vice President/General Manager of the Mixed Waste Facility, I have the authority to certify on behalf of the corporation.

HWMA CERTIFICATION  
[WAC 173-303-810(13)(a)]

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Perma-Fix Northwest Richland, Inc.



Richard Grondin, Vice President/General Manager



Date: May 30, 2019